

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

JANE ROE, individually and on behalf of all )  
others similarly situated, )

Plaintiff,

VS.

INTELLICORP RECORDS, INC., an Ohio corporation,

Defendant.

Case No. 1:12-CV-02288-JG

## STIPULATED DISCOVERY SCHEDULE AND [PROPOSED] ORDER THEREON

WHEREAS, the Court issued an Order regarding the identification of experts on November 8, 2013 and an initial Scheduling Order (Amended) on November 9, 2012 (ECF Doc. No. 64); and

WHEREAS, the parties believe a modification of the discovery schedule is in the interests of both parties;

IT IS HEREBY STIPULATED AND AGREED that the existing discovery schedule be modified as follows:

1. The parties shall exchange all expert reports required to be exchanged pursuant to Federal Rule of Civil Procedure 26(a)(2), which are currently due April 16,

2013, on May 8, 2013.

2. The parties shall exchange any reports intended solely to contradict or rebut evidence on the same subject matter identified by another party within 30 days thereafter, as provided in Federal Rule of Civil Procedure 26(a)(2)(D)(ii).

3. Any objection to the qualifications of experts under *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, must be filed on or before June 14, 2013.

Dated: April 8, 2013


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Dated: April 9, 2013

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A NEW WAY OF LIFE REENTRY  
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**[PROPOSED] ORDER**

GOOD CAUSE APPEARING, IT IS SO ORDERED.

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Hon. James S. Gwin  
United States District Court Judge